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Christopher Clark
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

CHRISTOPHER CLARK,

Plaintiff,

v.

MIDLAND CREDIT MANAGEMENT,
INC; and JOHN DOE 1; and JOHN DOE
2,

Defendants.

Case No. **3'13 - CV - 1782 HU**

COMPLAINT
(Violation of Fair Debt Collection
Practices Act)

JURISDICTION

1. This is an action for money damages brought by an individual consumer against Midland Credit Management, Inc., herein after "Midland", and John Does 1 and 2, as yet unknown individuals.
2. Jurisdiction is conferred on this Court by 15 U.S.C. § 1692 K (d).

PARTIES

3. Plaintiff, Christopher L. Clark, is a consumer and resident of the State of Oregon.

#54299

4. Defendant, Midland, is a Kansas Corporation, and is specifically licensed to transact business in Oregon, and is a debt collector within the meaning of 15 U.S.C. § 1692a (6).
5. Defendant, John Doe 1, is an individual. Undersigned Plaintiff will amend complaint after ascertaining Defendants true identity.
6. Defendant, John Doe 2, is an individual. Undersigned Plaintiff will amend complaint after ascertaining Defendants true identity.

FACTUAL ALLEGATIONS

7. On or about March 30th, 2013, Defendant John Doe 1, telephoned Plaintiff in violation of 15 U.S.C. § 1692c.
8. On or about March 30th, 2013, Defendants failed to verify the debt in violation of 15 U.S.C. § 1692 G (b).
9. On or about April 1st, 2013, Defendant John Doe 1, telephoned Plaintiff in violation of 15 U.S.C. § 1692c.
10. On or about April 1, 2013, Defendants failed to verify the debt in violation of 15 U.S.C. § 1692 G (b).
11. On or about April 1st, 2013, Defendant John Doe 2, telephoned Plaintiff in violation of 15 U.S.C. § 1692c.

CLAIM FOR RELIEF

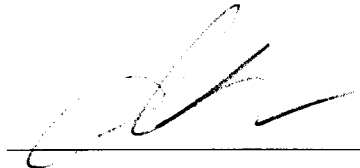
12. Plaintiff realleges paragraphs 1 through 11 as though fully set fourth herein.

13. The allegations above constitute a violation of 15 U.S.C. § 1692.
14. As a result of the allegations contained above, plaintiff has suffered actual damage to credit reputation, embarrassment, humiliation, frustration, loss of sleep, and agitation all to his economic and non-economic damage in the amount of \$25,000.00.
15. Pursuant to 15 U.S.C. § 1692 (k), Plaintiff is entitled to statutory damages in the amount of \$3,000.00.
16. Pursuant to 15 U.S.C. § 1692 (k), Plaintiff is entitled to Attorneys fees and costs in the prosecution of this action.

WHEREFORE, Plaintiff prays for relief as follows:

1. An award of statutory damages on his claim of relief in the amount of \$3,000.00;
2. An award of actual damages on his claim for relief in the amount of \$25,000.00;
3. An award of Attorney's fees incurred herein, in addition to costs and disbursements;
4. Such other relief as this Court deems just and equitable;
5. And trial by Jury is demanded.

Respectfully submitted this 7th day of October, 2013

A handwritten signature in black ink, appearing to read 'C. Clark', is written over a horizontal line.

By: Christopher Clark